

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Judge: Timothy W. Dore
Chapter: 13
Hearing Date: April 19, 2017
Hearing Location:
US Bankruptcy Court
700 Stewart Street
Courtroom 8106
Seattle WA 98101
Time: 9:30AM

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

In re:
JULIAN FLORES,
Debtor.

CHAPTER 13 PROCEEDING
NO. 11-20512-TWD
DEBTOR'S RESPONSE TO CREDITOR'S
MOTION FOR RELIEF FROM STAY AND
CO-DEBTOR STAY RE: 2007 CHEVROLET
EXPRESS CA

Debtor, Julian Flores, by and through his attorney, Lisa S. Tse, hereby replies to the Creditor's Motion for Relief from Stay and Co-Debtor Stay re: 2007 Chevrolet Express CA. In support thereof, Debtor states the following:

1. The plan filed on February 14, 2012 appears to provide Ally Financial \$100 monthly for a 2008 Chevrolet Cargo Van, presumably the abovementioned 2007 Chevrolet Express CA. Debtor listed the value of the collateral at \$16,450 with an amount owing to Ally Financial of \$15,294.49 as listed on the schedules.

Debtor's Response to Motion for Relief of
Stay - 1

ADVANTAGE LEGAL GROUP
12207 NE 8TH STREET
BELLEVUE, WA 98005
Tel: 425-452-9797
Facsimile: 425-440-7681

2. This appears to be a 100% payment to unsecured creditors, though there appears to be an asterisk indicating that Debtor is unable to pay unsecured creditors at 100% as indicated in XII.4.
3. Debtor's plan is nearing completion without the payment to Ally Financial in full. Debtor cannot make full payment of the vehicle within a couple of months for the large amount owed. Debtor is requesting that if his Chapter 13 Plan cannot remain open, he wishes to make payments to Ally Financial for the vehicle.

WHEREFORE, Debtor respectfully requests the Court to deny the creditor's Motion for Relief of Stay.

DATED, this 12th day of April, 2017.

/s/ Lisa S. Tse
Attorney for Debtor
Lisa S. Tse WSBA #43689
Advantage Legal Group
12207 NE 8th Street
Bellevue WA 98005
Tel: (425) 452-9797
Fax: (425) 440-7681
lisa@advantagelegalgroup.com

Debtor's Response to Motion for Relief of Stay - 2

ADVANTAGE LEGAL GROUP
12207 NE 8TH STREET
BELLEVUE, WA 98005
Tel: 425-452-9797
Facsimile: 425-440-7681